REMARKS

<u>Office Action</u>

In the Office Action mailed October 5, 2006, the Examiner rejected claims 1-5, 8, 11-13, and 16 under 35 U.S.C. 102(a) as being anticipated by Mitchell et al., U.S. Patent No. 6,628,304 (hereinafter "Mitchell"). The Examiner also rejected claims 6-7, 9-10, 14-15, and 17-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mitchell in view of Igarashi et al., U.S. Patent No. 2003/0061322. For reasons set forth more fully below, Applicant submits that the amended claims pending in this case are patentable over the references of record, either alone or in combination.

<u>Section 102 Rejection</u>

Claims 1, 3, and 5

The Mitchell reference is a system for displaying a hierarchical relationship between network devices coupled in a computer communication network. Claim 1 requires that the displayed hierarchical representation be for a modular document reproduction system. Mitchell does not disclose the generation of a graphical display of a hierarchical representation for a modular document reproduction system. Thus, every limitation of claim 1 is not explicitly or impliedly taught by Mitchell and Mitchell does not anticipate amended claim 1.

The structure of a computer communication network that may be displayed by the system in Mitchell is described at col. 7, lines 20-43. While this portion of Mitchell describes network structure, it does not teach or suggest that

the network devices are detected by the system of Mitchell and then used to update a graphical display of the hierarchical representation that is being displayed. Claim 1 requires that components of modules in a modular document reproduction system be detected and then the graphical display of the hierarchical representation of the modular reproduction system be updated to display the detected components. Because Mitchell does not disclose detection of document reproduction system components and the updating of a graphical display of a hierarchical representation for the document reproduction system, Mitchell cannot anticipate amended claim 1.

Claim 1 also requires that a request for status be sent to a module depicted in the hierarchical representation of a modular document reproduction system and that electrical control topology and fault status for each component of the module that received the request be integrated into the hierarchical representation of the modular document reproduction system. Mitchell does not disclose the sending of status requests to modules of a modular document reproduction system. Mitchell also does not teach the return of electrical control topology and fault status for each component of a module that received a status request. Thus, Mitchell does not anticipate amended claim 1.

Mitchell does not render amended claim 1 obvious. There is no teaching or suggestion that the hierarchical representation of a computer communication network is analogous to the connections of the modules in a modular document reproduction system. Moreover, Mitchell does not suggest that network devices be detected and used to update the graphical display of a hierarchical

representation of the computer communication network. Also, Mitchell does not suggest the sending of status requests to devices in the computer communication network so the devices respond with electrical control topology and fault status for all of the components of the device. Only by using Applicant's specification as a blueprint can Mitchell be modified to reach Applicant's claimed invention. Such use of Applicant's specification is impermissible. For at least these reasons, amended claim 1 is patentable over all references of record, either alone or in combination. As the limitations of claim 1 are also present in claims 3 and 5, they are also patentable over all references of record, either alone or in combination.

Claim 8

Claim 8 includes the limitations of claims 3 and 1 and is patentable for the reasons discussed with reference to those claims. Additionally, claim 8 requires that the color-coded indicia for fault data in the highest hierarchical level be different than color-coded indicia used in a lower hierarchical level to indicate the fault condition in a component of a module. As noted above, Mitchell does not provide updated graphical displays of hierarchical representations of a modular document reproduction system. Mitchell also fails to disclose the use of two colors for the displaying of faults within a system. Because Mitchell does not teach or suggest the use of two different colors to display faults for a component at a lower hierarchical level and at a module level, claim 8 is patentable over all references of record, either alone or in combination.

Section 103 Rejection

Claim 6

Claim 6 includes the limitations of claim 1 and is patentable for the reasons discussed with that claim. Thus, Mitchell does not provide a proper foundation for a section 103 ground of rejection. Additionally, claim 6 requires a count be maintained for each time the fault status *of a component* in a module changes and that the count be displayed in the graphical display of the hierarchical representation.

The Examiner relies upon Igarashi for teaching that an error count is maintained for a network device in a computer communication network. Such reliance is misplaced as Igarashi only teaches that a count of error types be maintained and displayed when the error dialog box is activated. The cited portions of Igarashi, namely, paragraphs 816 and 821, refer to FIGS. 43, 54, and 55. As shown in FIG. 55, multiple error types are displayed for the printer system, but no counts are displayed for the number of times that the error status of the printer system has changed. Rather, the error count provided in the error dialog window, which is shown to be zero in FIG. 54, indicates to a user the number of error types that may be viewed through the error dialog window, if activated. No error count is provided, however, for each of the error types displayed in FIG. 55. Thus, Igarashi does not teach or suggest maintaining a count of each time the fault status of a module component changes and the display of that count in the graphical representation of the hierarchical representation of a modular

document reproduction system. Consequently, the referenced combination does not teach or suggest the invention of claim 6.

In fact, Igarashi teaches away from the invention of claim 6 because it displays a perspective view of a printer, rather than a hierarchical representation of the printer. In order to arrive at the teaching being advocated by the Examiner, one would have to use Mitchell to modify the display of a network device in Igarashi so it is a hierarchical representation of the device. Then Igarashi would have to be modified with reference to Applicant's specification to provide a counter for each time the fault status of a component changes and the display of that counter in the graphical representation of the device. Using Applicant's specification to reconstruct the cited references is impermissible. Consequently, claim 6 is allowable over all references of record.

Additionally, one of ordinary skill in the art would not be motivated to combine Igarashi with Mitchell to display error counts with network device components depicted in hierarchical representations of the network. As already noted, Igarashi only aggregates error counts for a network device regardless as to which component generates one or more errors. For example, no count is shown for each of the errors depicted for the printer in FIGS. 43, 54, and 55. Specifically, the number of paper jams, the number of access cover openings, and the number of toner low warnings are not displayed. Moreover, these errors are not provided in a graphical display of a hierarchical representation of the network. Thus, one of ordinary skill would not be motivated to combine Igarashi

with Mitchell to display a count of errors for a network device in a hierarchical

representation of the network.

Claim 7

Claim 7 contains all of the limitations of claim 6 and is patentable for the

reasons stated above with respect to claims 1 and 6. Additionally, claim 7

requires that a request for status of a module of a modular document

reproduction system be generated at periodic intervals. Igarashi does not teach

or suggest the periodic generation of status requests. Therefore, the suggested

combination of Igarashi and Mitchell does not provide or render obvious the
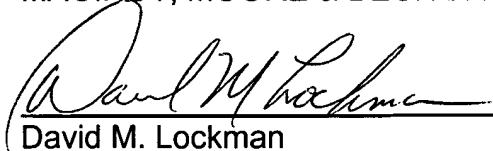
invention of claim 7.

In fact, Igarashi teaches away from the invention of claim 7 because it

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one would have to use Mitchell to modify the display of a network device in

Igarashi so it is a hierarchical representation of the device. Then Igarashi would

have to be modified with reference to Applicant's specification to provide the

sending of module status requests at periodic intervals. Using Applicant's

specification to reconstruct the cited references is impermissible. Consequently,

claim 7 is allowable over all references of record.

Conclusion

For the reasons set forth above, claims 1, 3, and 5-8 have been amended

and are patentable over all references of record. Reexamination and allowance

of all pending claims are earnestly solicited.

Respectfully submitted,
MAGINOT, MOORE & BECK LLP

David M. Lockman
Attorney for Applicant
Registration No. 34,214

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Maginot, Moore & Beck LLP
Chase Tower
111 Monument Circle, Suite 3250
Indianapolis, Indiana 46204-5109
(317) 638-2922 Telephone
(317) 638-2139 Facsimile